



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA 02109-3912

**MAR 29 2012**

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Eric Slifka, President and CEO  
Global Partners, LP  
800 South Street, Suite 200  
P.O. Box 9161  
Wareham, MA 02454-9161

**URGENT LEGAL MATTER  
REQUIRES PROMPT RESPONSE**

Re: Reporting Requirement under Section 114 of the Clean Air Act

Dear Mr. Slifka:

This reporting requirement is part of an EPA investigation to determine whether Global Partners, LP (Global) is in compliance with the Clean Air Act (Act), 42 U.S.C. § 7401 et seq., at its terminal locations in New England.

EPA issues this reporting requirement pursuant to Section 114 of the Act, 42 U.S.C. § 7414. Under Section 114, EPA may require any person who is subject to any requirement of the Act to: establish records; make reports; sample emissions at the location and in the manner prescribed by EPA; and provide such other information as EPA may reasonably require.

**Reporting Requirement**

Pursuant to this authority, EPA directs you to provide the following information for the Global facility located in South Portland, Maine within 60 days of receipt of this letter.

1. For the Global facility in South Portland, ME provide the following information about the tanks, loading racks, and associated equipment used in the transfer, storage and distribution of #6 oil or asphalt:
  - a. Maximum daily, monthly and annual design throughput capacity of # 6 oil and asphalt at the facility. When providing the maximum capacity for each facility, consider facility-specific limitations such as number and storage capacity of storage tanks, tank fill rate limitations, and loading rack limitations. Provide a detailed description of how the maximum throughput capacity was calculated for the facility.
  - b. Date of purchase and/or installation of each loading rack at the facility;
  - c. Date that each #6 oil and each asphalt tank was put into service with #6 oil and/or asphalt;
  - d. Date that each #6 oil and each asphalt loading arm was put into service;
  - e. Date that any tank or loading rack was taken out of service.

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2. For the Global facility located in South Portland, Maine:
  - a. Provide a list of each capital project, including but not limited to installations, repairs, and retrofits of process equipment (e.g. tank, loading rack, pumps, piping) and process support equipment (e.g. boilers) which:
    - i. Involved the purchase, storage, distribution, or transportation of #6 oil and/or asphalt;
    - ii. Had actual or authorized expenditures of \$100,000 or more; and
    - iii. Had commenced construction since January 1990.
  - b. For each project, provide the following information:
    - i. Project description;
    - ii. The purpose/function of the equipment;
    - iii. The cost and date of purchase;
    - iv. The date installation was completed;
    - v. The date the equipment began operating;
    - vi. The name of the manufacturer, model number, size, maximum production rate, and any other operational specifications; and
    - vii. Information pertaining to any emission control devices associated with such process equipment, including the type of emission control device, when such device was installed, and any data pertaining to emission reductions from use of such device.
  - c. The list should include, but not be limited to the following types of capital projects:
    - i. Conversion of a storage tank to store #6 oil or asphalt;
    - ii. Insulation of a storage tank and associated piping;
    - iii. Installation or replacement of large sections of piping;
    - iv. Installation or replacement of a boiler that is used to maintain temperature of #6 oil or asphalt; and
    - v. Installation of any type of vapor collection and control system that is used to control odors and/or reduce emissions from the storage, distribution and transportation of #6 oil and/or asphalt.

Submissions required by this letter shall be mailed to:

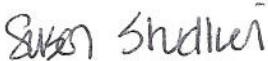
Elizabeth Kudarauskas  
U.S. Environmental Protection Agency  
5 Post Office Square, Suite 100  
Mail Code: OES 04-2  
Boston, MA 02109-3912

Be aware that if Global does not provide all the information required under the reporting requirement in a timely manner EPA may order it to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Note that federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

Global may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R §2.203(b). Note that certain categories of information, such as emissions data, are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Global. Please be aware that states may have different rules and regulations governing the protection of confidential business information.

If you have any questions regarding this reporting requirement, please contact Environmental Engineer Elizabeth Kudarauskas, at (617) 918-1564, or have your attorney call Senior Enforcement Counsel Thomas Olivier at (617) 918-1737.

Sincerely,



Susan Studlien, Director  
Office of Environmental Stewardship

Enclosure

cc: Pamela Monroe, NH DES  
Robert Girard, CT DEP  
Ted Burns, RI DEM  
Kurt Tidd, ME DEP  
Ed Pawlowski, MA DEP Northeast Regional Office  
Laurel Carlson, MA DEP Southeast Regional Office